

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**MOBILEMEDIA IDEAS LLC,**

**Plaintiff,**

**v.**

**RESEARCH IN MOTION LIMITED and  
RESEARCH IN MOTION CORPORATION,**

**Defendants.**

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**CIVIL ACTION NO. 2:10-CV-113**

**MOBILEMEDIA IDEAS LLC’S COMPUTATION OF DAMAGES  
PURSUANT TO THE COURT’S DISCOVERY ORDER**

Pursuant to paragraph 3(b) of the Discovery Order entered on May 23, 2011 (D.E. # 82), Plaintiff MobileMedia Ideas LLC (“MMI”) provides the following computation of damages.

MMI presently intends to seek damages in this matter pursuant to 35 U.S.C. § 284, which provides that the Court shall award “damages adequate to compensate for the infringement, but in no event less than a reasonable royalty for the use made of the invention by the infringer, together with interest and costs as fixed by the court,” and provides that the Court “may increase the damages up to three times the amount found or assessed.” Because, upon information and belief, the infringement by defendants Research In Motion Limited and Research In Motion Corporation (collectively, “Defendants”) is and has been willful, MMI presently intends to ask that these damages be enhanced by up to three times and that it be awarded attorneys’ fees and costs pursuant to 35 U.S.C. §§ 284 and 285.

Precise calculation of damages will require further discovery from Defendants and will be the subject of expert testimony. Accordingly, MMI will supplement this disclosure as discovery progresses or for any other reason, including through the report(s) of its testifying expert(s). MMI will confer with Defendants about making available for inspection and copying documents or other evidentiary material on which MMI's damages computation is based as discovery in this matter continues.

Dated: June 16, 2011

Respectfully submitted,

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***Attorneys for Plaintiff  
MobileMedia Ideas LLC***

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on June 16, 2011. As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Kristi Thomas \_\_\_\_\_  
Kristi Thomas